

UNITED STATES BANKRUPTCY COURT
DISTRICT OF RHODE ISLAND (PROVIDENCE)

IN RE:

Robert Leonard Oliver, Jr.,
Debtor

Case No. 22-10241-DF
Chapter 13

OBJECTION TO DEBTOR'S MOTION TO AMEND

Now comes JPMorgan Chase Bank, N.A., successor by merger to Chase Home Finance LLC hereby objects to the debtor's Motion to Amend. In support of its objection, JPMorgan Chase Bank, N.A., successor by merger to Chase Home Finance LLC states as follows:

1. Admitted.
2. Admitted. JPMorgan Chase Bank, N.A., successor by merger to Chase Home Finance LLC is the holder of a first mortgage on the property located at 56 Naomi Street, Bristol, RI 02809.
3. Admitted the Debtor filed for bankruptcy protection. JPMorgan Chase Bank, N.A. neither admits nor denies the debtor's reasons for filing for bankruptcy protection.
4. Admitted, JPMorgan Chase Bank, N.A. filed its Motion for Relief on September 19, 2022.
5. JPMorgan Chase Bank, N.A. is without sufficient knowledge to admit or deny any of the statements made by the debtor in paragraph 5.
6. Admitted in part and denied in part. The Consent Order filed on November 8, 2022. Per the filed document, the debtor was post petition due June 1, 2022 through and including November 1, 2022 in the amount of \$819.85 each less a suspense credit of \$40.15 for a total post petition amount due of \$4,878.95.
7. Admitted
8. Admitted



9. JPMorgan Chase Bank, N.A is without sufficient knowledge to admit or deny any of the statements made by the debtor is paragraph 9.
10. JPMorgan Chase Bank, N.A is without sufficient knowledge to admit or deny any of the statements made by the debtor is paragraph 10.
11. JPMorgan Chase Bank, N.A is without sufficient knowledge to admit or deny any of the statements made by the debtor is paragraph 11.
12. JPMorgan Chase Bank, N.A is without sufficient knowledge to admit or deny any of the statements made by the debtor is paragraph 12.
13. JPMorgan Chase Bank, N.A is without sufficient knowledge to admit or deny any of the statements made by the debtor is paragraph 13.
14. JPMorgan Chase Bank, N.A is without sufficient knowledge to admit or deny any of the statements made by the debtor is paragraph 14.
15. JPMorgan Chase Bank, N.A is without sufficient knowledge to admit or deny any of the statements made by the debtor is paragraph 15.
16. Denied. The Debtor entered into the Consent Order freely and voluntarily knowing that the result of nonpayment would be relief from stay.
17. JPMorgan Chase Bank, N.A is without sufficient knowledge to admit or deny any of the statements made by the debtor is paragraph 17.
18. Denied as irrelevant. The Debtor entered into the Consent Order freely and voluntarily knowing that the result of nonpayment would be relief from stay.

WHEREFORE, JPMorgan Chase Bank, N.A., successor by merger to Chase Home Finance LLC requests that the debtor's motion to amend be denied.

Respectfully submitted,
JPMorgan Chase Bank, N.A., successor by merger to
Chase Home Finance LLC,
By its Attorney

/s/ Joseph Dolben

Joseph Dolben
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Dated: February 27, 2023

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CERTIFICATE OF SERVICE

I, Joseph Dolben, state that on February 27, 2023 I electronically filed the foregoing document with the United States Bankruptcy Court for the District of Rhode Island on behalf of JPMorgan Chase Bank, N.A., successor by merger to Chase Home Finance LLC using the CM/ECF System. I served the foregoing document on the following CM/ECF participants:

Jack Pitts
Charles Pisaturo, Jr.
Gary L. Donahue

I certify that I have mailed by first class mail, postage prepaid, the documents electronically filed with the Court on the following non CM/ECF participants:

Robert Leonard Oliver, Jr.
a/k/a Robert Oliver
56 Naomi St
Bristol, RI 02809

Respectfully submitted,
JPMorgan Chase Bank, N.A., successor by merger to
Chase Home Finance LLC,
By its Attorney

/s/ Joseph Dolben

Joseph Dolben
RI Bar Number 7916
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